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*Lead Counsel for Court-Appointed Lead Plaintiff and the Class*

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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

IN RE TEZOS SECURITIES LITIGATION

This document relates to:

ALL ACTIONS.

Master File No. 17-cv-06779-RS

**CLASS ACTION**

**STIPULATION AND ~~[PROPOSED]~~  
ORDER TO ADD NEW PLAINTIFF AND  
WITHDRAW FIRST AMENDED  
COMPLAINT**

Judge: Hon. Richard Seeborg

WHEREAS, Lead Plaintiff Arman Anvari filed a Consolidated Complaint (“Complaint”) (Dkt. No. 108) against Dynamic Ledger Solutions, Inc. (“DLS”), Tezos Stiftung, (“Tezos Foundation”), Kathleen Breitman, Arthur Breitman, Timothy Cook Draper (“Draper”), Draper Associates V Crypto LLC (“Draper Associates Crypto”) and Bitcoin Suisse AG (“Bitcoin Suisse”);

WHEREAS, on August 7, 2018, and August 31, 2018 the Court issued orders (Dkt. Nos. 148 and 163) granting the motions to dismiss the Complaint filed by Draper, Draper Associates Crypto and Bitcoin Suisse (collectively, the “Dismissed Defendants”), and dismissing the Dismissed Defendants from this action with prejudice;

WHEREAS, on September 14, 2018, DLS, the Tezos Foundation, Kathleen Breitman and Arthur Breitman (collectively, “Defendants”) filed their answers (Dkt. Nos. 168-171) to the Complaint;

WHEREAS, Lead Plaintiff seeks to add a plaintiff, Pumaro LLC, to the action;

WHEREAS, on November 12, 2018 Lead Plaintiff filed an Amended Consolidated Complaint (Dkt. No. 180) adding Pumaro LLC as a plaintiff;

WHEREAS, on or around November 12, 2018, the Dismissed Defendants objected to being included as named parties in the Amended Consolidated Complaint;

WHEREAS, Lead Plaintiff and Defendants have agreed that Pumaro LLC may be added to the Complaint without the need to file an amended pleading and, therefore, amended answers by Defendants;

IT IS HEREBY STIPULATED AND AGREED, by the undersigned counsel on behalf of Lead Plaintiff and Defendants that:

(a) The Amended Consolidated Complaint is withdrawn and should be stricken from the Court’s docket in the above-captioned matter;

(b) The Complaint is amended to add plaintiff Pumaro LLC and the following allegation as paragraph 14a:

Plaintiff Pumaro LLC (“Pumaro”) is a Texas limited liability company which invested 1.9 Bitcoin in the Tezos ICO on July 1, 2017. Pumaro was promised delivery of 11,400 Tezos tokens upon the conclusion of the Tezos ICO and the launch of the Tezos network.

(c) Defendants, and each of them, answer paragraph 14a as follows :

Defendants are without sufficient knowledge or information to form a belief as to the truth of the allegations in paragraph 14a pertaining to the residency of Pumaro and its alleged contribution to the Fundraiser, and on that basis deny them. Except as expressly admitted, Defendants deny each and every remaining allegation of paragraph 14a.

Stipulated and agreed to by:

Date: November 20, 2018

Respectfully Submitted,

LTL ATTORNEYS LLP

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19 *Attorneys for Defendants Dynamic Ledger*  
20 *Solutions, Inc., Kathleen Breitman, and*  
21 *Arthur Breitman*

*Attorneys for Defendant Dynamic Ledger*  
*Solutions, Inc.*

1 IT IS SO ORDERED. The Clerk of the Court is instructed to strike from the Court's files  
2 Docket Entry Number 180.

3  
4 Dated: November 21, 2018

A handwritten signature in blue ink, appearing to read "Richard Seeborg", is written over a horizontal line.

The Hon. Richard Seeborg  
United States District Judge